

### REMARKS

Applicants respectfully request favorable reconsideration of this application, as amended.

As will be evident, the claims have been editorially revised to improve grammar and readability. The rejection under 35 U.S.C. §112, second paragraph, has been appropriately addressed.

Regarding the objection to the Information Disclosure Statement filed January 5, 2004, a replacement copy of the Smart Card Handbook, with pp. 262-263, is attached hereto. Applicants request the information contained therein be considered and request an endorsed copy of Form PTO-1449 from the Information Disclosure Statement dated January 5, 2004.

Without acceding to the outstanding rejections under 35 U.S.C. §§ 102(b) and 103(a), Claims 1-9 and 11-13 have been amended to define certain distinctive features of the invention more precisely. As will be appreciated from the following remarks, Claims 1-13 distinguish patentably from the Ohuchi, Curiger et al. and Bitoh patents cited in the outstanding rejections.

Independent Claims 1 and 11 have been amended more precisely to set forth the relationship between the encoding processing computing unit and the registers contained therein and the encoding processing computing unit and a random number generator--in particular, that

the encoding processing computing unit stores data and calculated results in the registers, and that random numbers from the random number generator are used as pseudo address signals for data transfer to the encoding processing computing unit. Specifically, Claims 1 and 11 both recite registers, which store data used for a computation and calculated results from the computation, and using random numbers generated by a random number generator as pseudo address signals to transfer data to the encoding processing computing unit.

Ohuchi does not disclose or suggest that the internal structure of the memory device 21 includes registers that store data for the computation as well as results from the computation. In addition, Ohuchi does not disclose or suggest using random numbers from a random number generator as pseudo address signals for data transfer to the encoding processing computing unit. Claims 1 and 11 thus distinguish patentably from Ohuchi.

Independent Claims 3 and 9 have been amended more precisely to set forth the relationship between the encoding processing computing unit and a random number generator--in particular, that the encoding processing computing unit uses random numbers from the random number generator as pseudo address signals for data transfer to the encoding processing computing unit. As Ohuchi does not disclose or suggest using random numbers from a

random number generator as pseudo address signals for data transfer to an encoding processing computing unit, the reference evidently fails to disclose or suggest the arrangement of Applicants' Claims 3 and 9. Similar to Claims 1 and 11, Claim 9 also recites that the registers store calculated results from the computation for the encoding process or the decoding process, which is not disclosed or suggested by Ohuchi. Claims 3 and 9 thus distinguish patentably from Ohuchi.

Cüriger et al. was cited with respect to the modulo calculations of dependent Claims 2 and 4, but is not seen to overcome the above-discussed deficiencies of Ohuchi relative to independent Claims 1 and 3.

Official Notice was cited with respect to the module configuration of dependent Claim 10; but, even if appropriate, it is not seen to overcome the above-discussed deficiencies of Ohuchi relative to independent Claim 9.

Independent Claims 5, 7, 12 and 13 and have been amended merely to improve grammar and readability. Claims 5 and 7 recite that the encoding processing computing unit uses random numbers from the random number generator as pseudo address signals for data transfer to the encoding processing computing unit. Although Bitoh does disclose a random number generator, it teaches comparing the random numbers with a plurality of

numerical values to determine whether the data can be saved (see, Column 10, lines 40-46). The reference does not teach or suggest using the random numbers from a random number generator as pseudo address signals. It follows, therefore, that the proposed combination of Bitoh with Ohuchi lacks this feature as well. Claims 5 and 7 thus distinguish patentably from the Ohuchi and Bitoh combination.

Curiger et al. was cited with respect to the modulo calculations of dependent Claims 6 and 8, but is not seen to overcome the above-discussed deficiencies of the Ohuchi and Bitoh combination relative to independent Claims 5 and 7.

Claims 12 and 13 contain recitations similar to those contained in Claims 5 and 7 related to the use of random numbers as pseudo address signals in association with the data transfer. Claims 12 and 13 thus also distinguish patentably from the Ohuchi and Bitoh combination.

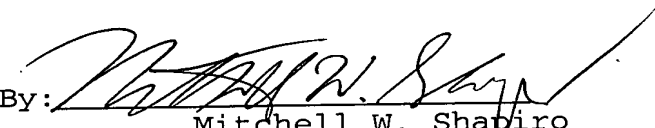
In view of the amendments presented herein, and for the reasons explained in the preceding remarks, Claims 1-13 are believed to be in condition for allowance. Applicants respectfully request that this application now be passed to issue.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 any fees under 37 CFR §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been requested separately, such extension is hereby requested.

Respectfully submitted,

Date: August 24, 2004

By:

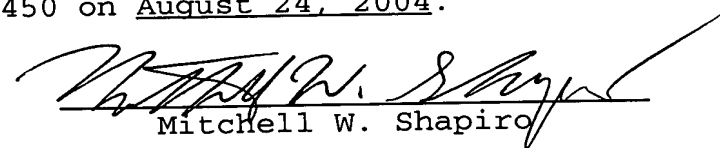
  
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I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on August 24, 2004.

  
Mitchell W. Shapiro